

Thomas A. Thompson [Wyo. State Bar No. 6-2640]
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Attorney for Defendant City of Powell, Wyoming

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

RYAN DAVIS, an individual,)	
)	
Plaintiff,)	
)	Case No. 23-CV-230-S
v.)	
)	
THE CITY OF POWELL, WYOMING,)	
)	
Defendant.)	

**DEFENDANT'S DESIGNATION OF EXPERT WITNESSES PURSUANT TO
FED. R. CIV. P. 26(a)(2)**

COME NOW the Defendant, by and through its undersigned counsel, pursuant to the Court's *Order on Initial Pretrial Conference* [ECF No. 35], as well as Federal Rule of Civil Procedure 26(a)(2), and U.S.D.C.L.R. 26.1(e), and hereby designate the following non-retained expert witnesses who may be called to render opinions at the trial of this matter, as follows:

NON-RETAINED EXPERT WITNESSES – PURSUANT TO F.R.C.P 26(a)(2)(c)

1. Kelly Christensen, MD

Family Practice

777 Avenue H

Powell, WY 82435

(307) 754-7257

Dr. Christensen is a family practice physician and one of Plaintiff's treating medical providers. If called, it is expected that Dr. Christensen will testify consistent with his medical records and chart notes related to his treatment of the Plaintiff. Dr. Christensen may be called to testify as to the medical treatment he performed on the Plaintiff and Plaintiff's physical limitations both before and after the Plaintiff contracted COVID-19. Dr. Christensen may also be called regarding his opinions related to Plaintiff's work restrictions and/or limitations both before and after contracting COVID-19 as per his medical notes.

2. Jana Keller, PA-C

Family Practice

777 Avenue H

Powell, WY 82435

(307) 754-7257

Ms. Keller is a physician assistant and one of Plaintiff's treating medical providers. If called, it is expected that PA-C Keller will testify consistent with her medical records and chart notes related to her treatment of the Plaintiff. PA-C Keller may be called to testify as to the medical treatment she performed on the Plaintiff and Plaintiff's physical limitations both before and after he contracted COVID-19. PA-C

Keller may also be called regarding her opinions related to Plaintiff's work restrictions and/or limitations both before and after contracting COVID-19 as per her medical notes.

**3. Brian D. Kelly, DO (retired)
(407) 765-0732**

Dr. Kelly is a retired cardiologist and one of Plaintiff's treating medical providers. If called, it is expected that Dr. Kelly will testify consistent with his medical records and chart notes related to his treatment of the Plaintiff. Dr. Kelly may be called to testify as to the medical treatment he performed on the Plaintiff and Plaintiff's physical limitations both before and after he contracted COVID-19. Dr. Kelly may also be called regarding his opinions related to Plaintiff's work restrictions and/or limitations both before and after contracting COVID-19 as per his medical notes.

**4. Adam Childers, DO
777 Avenue H
Powell, WY 82435
(307) 754-2267**

Dr. Childer is a family practice physician and one of Plaintiff's treating medical providers. If called, it is expected that Dr. Childers will testify consistent with his medical records and chart notes related to his treatment of the Plaintiff. Dr. Childers may be called to testify as to the medical treatment he performed on the Plaintiff and Plaintiff's physical limitations both before and after the Plaintiff contracted COVID-19. Dr. Childers may also be called regarding his opinions related to Plaintiff's work

restrictions and/or limitations both before and after contracting COVID-19 as per his medical notes.

GENERAL PROVISIONS

1. All opinions of the expert witnesses set forth herein are and will be to the required degree of probability pursuant to applicable law in the witness's field of expertise.
2. This designation is intended to supplement any and all interrogatories and requests for production of documents propounded by the Plaintiff, as well as any deposition of a particular witness.
3. The experts listed herein may criticize, comment upon, and/or rebut the deposition testimony, trial testimony, and/or data/reports, written materials and/or any raw data or testing materials produced and/or compiled in this case by the expert(s) or other witnesses designated or called by any of the Plaintiff.
4. Defendant reserves the right to call any expert designated by the Plaintiff in this case, whether retained or withdrawn as an expert.
5. Because discovery, depositions and document exchange are ongoing, Defendant reserves the right to supplement this designation by giving opposing counsel notice of additional opinions that may be generated from newly discovered and/or produced evidence or depositions.

SUPPLEMENTAL DESIGNATION RESERVED

Defendant reserves the right to supplement this designation of expert witnesses pending ongoing discovery, or review of additional discovery not yet obtained, or which will be provided later in the case.

REBUTTAL EXPERTS

Defendant reserves the right to designate rebuttal testimony from experts identified in this disclosure, as well as the right to designate additional experts as reasonable and necessary to provide opinions and/or rebuttal testimony in response to opinions advanced by discovery or designations obtained from Plaintiff's expert(s) as permitted by the Court and the Federal Rules of Civil Procedure.

RESPECTFULLY SUBMITTED this 17th day of December 2024.

/s/ Thomas A. Thompson _____

Thomas A. Thompson

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing with the Clerk of Court and served other parties by the following means on this 17th day of December 2024:

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CM/ECF

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/s/ MaryBeth Oatsvall _____

MaryBeth Oatsvall

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